

EXHIBIT 15

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO, LLC; OTTO
TRUCKING LLC,
Defendants.

****ATTORNEYS' EYES ONLY****

VIDEO DEPOSITION OF JUR VAN DEN BERG

San Francisco, California

Wednesday, August 2, 2017

Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2671707

PAGES 1 - 387

Page 172

12:26:13

1 day. And the -- the third and -- and beyond, I --
2 I have not -- I -- I don't know what they are at
3 this moment.

4 Q. Is it your understanding whether any of
5 the milestones have been made?

12:26:26

6 [REDACTED]

7 Q. How -- how much compensation is tied to
8 these milestones?

9 MS. HARTNETT: Objection.

10 THE DEPONENT: A sig- -- a significant
11 amount. Essentially all of our share in -- in Otto
12 became these -- these -- became Uber shares with
13 these milestones attached, so...

12:26:38

14 Q. (By Mr. Judah) Do you have any
15 understanding as to when -- when any of those
16 milestones are going to start getting hit?

12:26:51

17 A. No, I have not.

18 Q. Have you discussed the timing of when
19 those milestones are going to be achieved with
20 anyone?

12:27:05

21 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:27:15

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [x] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: August 3, 2017

22
23 
24

25 Rebecca L. Romano, RPR,
CSR. No 12546